

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

**NICOLE MARKOVIC, JOHN HAHN
AND JEFFREY HOLMES,**

Civil Action No.

Plaintiffs,

v.

**MONARCH RECOVERY
MANAGEMENT, INC.**

Defendant.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE THAT, pursuant to 28 U.S.C. § 1441(b) and 28 U.S.C. § 1331, Defendant, Monarch Recovery Management, Inc. (hereafter "Monarch") by and through its counsel, Margolis Edelstein, hereby removes the action captioned as Nicole Markovic, John Hahn and Jeffrey Holmes v. Monarch Recovery Management, Inc., as filed in the Circuit Court for the State of Wisconsin, Milwaukee County at docket number 2020CV006735 ("the Action"), to the United States District Court for the Eastern District of Wisconsin, based upon the following:

1. On or about November 13, 2020 Plaintiffs, Nicole Markovic, John Hahn and Jeffrey Holmes (hereinafter "Plaintiffs") filed the Action in the Circuit Court for the State of Wisconsin, Milwaukee County at docket number 2020CV006735. A true and correct copy of Plaintiffs' Complaint in the Action is attached hereto as Exhibit "A."
2. Monarch first received notice of the Action on February 5, 2021, when it was served with Plaintiffs' Complaint.
3. Based on the foregoing, Monarch has timely filed this Notice of Removal within thirty days of being served with the Complaint and within thirty days of the date that the Action was first removable. See 28 U.S.C. § 1446(b).

4. The Action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Monarch pursuant to the provisions of 28 U.S.C. § 1441(b), in that Plaintiffs have alleged that Monarch violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*, thereby asserting claims that arise under federal law.

5. In that the causes of action alleged by the Plaintiffs arise from the performance of obligations of the parties within the State of Wisconsin, Milwaukee County, the United States District Court for the Eastern District of Wisconsin should be assigned the Action.

6. Pursuant to 28 U.S.C. § 1446(d), Monarch will file a copy of this Notice of Removal with the Clerk of the United States District Court for the Eastern District of Wisconsin, will serve counsel for Plaintiffs with a copy of this Notice of Removal and will file the Notice of Removal in the Circuit Court for the State of Wisconsin, Milwaukee County.

WHEREFORE, Defendant, Monarch Recovery Management, Inc. notifies this Court that this cause is removed from the Circuit Court for the State of Wisconsin, Milwaukee County to the United States District Court for the Eastern District of Wisconsin pursuant to the provisions of 28 U.S.C. §§1331, and 1446.

MARGOLIS EDELSTEIN

By: /s/ Ronald M. Metcho
RONALD M. METCHO
220 Penn Avenue, Suite 305
Scranton, PA 18503
(570) 342-4231
(570) 342-4841 (f)
rmetcho@margolisedelstein.com
Attorneys for Defendant
Monarch Recovery Management, Inc.

Dated: February 9, 2021

CC VIA US MAIL AND ECF

John D. Blythin, Esq.
Mark A. Eldridge, Esq.
Jesse Fruchter, Esq.
Ben J. Slatky, Esq.
Ademi LLP
3620 East Layton Road
Cudahy, WI 53110